

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

**This Document Relates to the TPP Trial
Subclasses**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

CERTIFICATION OF JESSICA DAVIDSON

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”)’s Response to Plaintiffs’ Trial Brief.

2. Attached hereto as Exhibit 1 is a true and correct copy of relevant excerpts from the April 20, 2021 transcript of the deposition of Min Li, Ph.D.

3. Attached hereto as Exhibit 2 is a true and correct copy of ZHP02730423 (and translation). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

4. Attached hereto as Exhibit 3 is a true and correct copy of ZHP02730425 (and translation). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

5. Attached hereto as Exhibit 4 is a true and correct copy of ZHP02730426 (and translation). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 5 is a true and correct copy of March 12, 2024 emails to Marlene Goldenberg.

7. Attached hereto as Exhibit 6 is a true and correct copy of a March 12, 2024 letter from Alexia Renee Brancato Brancato re: Daniel Brais (Humana), Steven Taylor (OptumRx), and Wendy Woon-Fat (OptumRx). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

8. Attached hereto as Exhibit 7 is a true and correct copy of a March 12, 2024 letter from Alexia Renee Brancato re: Owen McMahon (Rite-Aid) and Cesar Cedenio (Humana). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

9. Attached hereto as Exhibit 8 is a true and correct copy of a March 12, 2024 letter from Alexia Renee Brancato re: Julie Webb (Cardinal Health). This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

10. Attached hereto as Exhibit 9 is a true and correct copy of a May 12, 2021 letter from Gregory E. Ostfeld.

11. Attached hereto as Exhibit 10 is a true and correct copy of a June 4, 2021 letter from David DaPonte.

Dated: March 21, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 21, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson